

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 25-10068 (CTG)
)
) (Jointly Administered)
)
Rel. Dkt. No. 527, 531

**SUPPLEMENTAL DECLARATION OF BRADFORD J. SANDLER
IN SUPPORT OF APPLICATION FOR AUTHORIZATION
TO EMPLOY AND RETAIN PACHULSKI STANG ZIEHL & JONES LLP
AS CO-COUNSEL TO THE COMMITTEE EFFECTIVE AS OF JANUARY 31, 2025**

I, Bradford J. Sandler, declare under penalty of perjury as follows:

1. I am a partner in the law firm of Pachulski Stang Ziehl & Jones LLP (“PSZJ” or the “Firm”), located at 919 North Market Street, 17th Floor, Wilmington, DE 19801. I am admitted to practice law in Delaware, Pennsylvania, New Jersey, and New York. This Declaration is submitted in support of the *Application of the Official Committee of Unsecured Creditors for Authorization to Employ and Retain Pachulski Stang Ziehl & Jones LLP as Co-Counsel to the Official Committee of Unsecured Creditors Effective as of January 31, 2025* (the “Application”), the *Declaration of Bradford J. Sandler in Support of Application for Authorization to Employ and Retain Pachulski Stang Ziehl & Jones LLP as Co-Counsel to the*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

Committee Effective as of January 31, 2025 filed with the Application on February 28, 2025 (the “Initial Declaration”).²

2. PSZJ has completed its conflicts review and I make the following disclosures in this Supplemental Declaration:

(a) PSZJ represents Wilmington Saving Fund Society FSB, solely in its capacity as indenture trustee, in ongoing litigation related to the post-confirmation Chapter 11 cases of Quorum Health Corporation, et al. in the United States Bankruptcy Court of the District of Delaware, Case No. 20-10766 (BLS), Adv. Proc. No. 21-51190 (BLS). This representation is unrelated to the Debtors’ Chapter 11 Cases.

(b) PSZJ previously represented Hewlett Packard Financial Services Co. in matters unrelated to the Debtors’ Chapter 11 Cases which unrelated representations have concluded.

(c) PSZJ represents an affiliate of Brookfield (E&A) LLC in a matter unrelated to the Debtors’ Chapter 11 Cases.

(d) PSZJ previously represented HPS Investment Partners LLC in matters unrelated to the Debtors, which unrelated representations concluded several years prior to the Petition Date.

(e) PSZJ previously represented Ernst & Young solely in its capacity as Monitor in the Nortel Networks UK Limited Chapter 15 proceedings in the United States Bankruptcy Court for the District of Delaware, Case No. 09-11972 (MFW).

3. To date, it appears that PSZJ does not hold or represent any interest adverse to and has no connection, subject to the disclosures set forth herein, with the Debtors, the Debtors’ creditors, the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”), or any party in interest herein in the matters upon which PSZJ is to be retained. PSZJ is continuing to conduct an ongoing review of its files to ensure that no conflicts or other

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Application.

disqualifying circumstances exist or arise. If any new material facts, or additional connections, or relationships are discovered or arise, PSZJ will supplement its disclosure to the Court.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 19, 2025

/s/ Bradford J. Sandler

Bradford J. Sandler